

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**5:19-BK-72555
CHAPTER 7**

IN RE: LADONNA HUMPHREY, DEBTOR

**RESPONSE TO MOTION FOR APPROVAL OF SALE PURSUANT TO 11 U.S.C. §363 AND
NOTICE OF OPPORTUNITY TO OBJECT AND OVERBID**

Comes now, LaDonna Humphrey (hereinafter, “Debtor”), by and through her attorney, Stanley V. Bond, and for this, her response to Motion for Approval of Sale Pursuant to 11 U.S.C. §363 and Notice of Opportunity to Object and Overbid (hereinafter, “Motion”), states and alleges as follows:

1. That the Trustee has received a Proposed Offer from Absolute Pediatric Services, Inc. d/b/a Absolute Pediatric Services (hereinafter, “Absolute”) in the amount of \$12,500 to purchase causes of action that the Debtor listed in her bankruptcy petition.
2. That post filing, it was made known to Debtor and her counsel that there are three (3) causes of action that the Debtor may pursue on appeal arising from the state court action with the Proposed Offeror.
3. That Debtor has filed an Amended Schedule B and C explaining the potential causes of action.
4. That at the time of the initial scheduling of assets, the appeal had not commenced.

5. That the appeal has commenced with three separate causes of action included in the Amended Schedules B and C filed contemporaneously with this filing.
6. That the Proposed Offer was made based on previously filed schedules.
7. That Debtor objects to the estate selling the cause of action for striking the Debtor's answer and for the denial of a jury trial on damages.

WHEREFORE, Respondent prays that the Motion for Approval of Sale Pursuant to 11 USC §363 and Notice of Opportunity to Object and Overbid be denied, and for all other relief to which Debtor is entitled.

Respectfully Submitted,

LaDonna Humphrey

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CERTIFICATE OF SERVICE

I, Stanley V. Bond, hereby certify that the foregoing Response has been duly served via the Court's CM/ECF electronic mail to all Filing users on 25th December 2019, as follows:

Bianca Rucker, Chapter 7 Trustee

Charles T. Coleman and Glenn Ritter, Attorneys for Movant

By: /s/ Stanley V. Bond